

**UNITED STATES DISTRICT COURT**  
**For the**  
**District of Puerto Rico**

Rico Sun Tours, Inc.

CLERK'S OFFICE  
U.S. DISTRICT COURT  
SAN JUAN, PR

Plaintiff(s)

V.

Civil Action No. 14-cv-01583-JAG

EDGARD CAPELES VARGAS; RICARDO  
SERRA CASTILLO; RICARDO RIVAS  
TORRES; GERMAN VAZQUEZ; WILLIAM  
TORRES; SAN JUAN HAPPY TOURS,  
CORP.; UNITED TOUR GUIDES COOP OF  
PUERTO RICO; UNION DE  
TRANSPORTISTAS Y RAMAS ANEXAS, INC.

Defendant(s)

**MOTION OF DISMISSAL**

To:

UNITED STATES DISTRICT COURT  
For the District of Puerto Rico

Defendants, German Vazquez by his own right, respectfully state and pray to the Honorable Court and his Clerk of Court as follows:

1. On September 8, 2014, Plaintiff filed Motion for Entry of Default Final Judgment to a Union such called Union de Transportistas y Ramas Anexas, Inc. for violation of Section 1 and Section 2 of the Sherman Act, 15 U.S.C. & 1, et seg (Dkt. No.1).
2. Plaintiff pleaded that copy of said Complaint and Summons in this civil action was served upon UTRA President, German Vazquez (That never occur).
3. The Co-Defendants German Vazquez was summons in august 4, 2014 as individual in the Complaint (See copy of summons attached), never was summons in representation of such Union.
4. Therefore, Plaintiff files a Proof of Service improperly at the Clerk Office of this court.

**UNITED STATES DISTRICT COURT**

RECEIVED  
For the

**District of Puerto Rico**

5. If a corporation is suing an officer must be served and that never happened. The document filed at the Clerk Office (Proof of Service) is improperly and false.

Therefore, German Vazquez, President of Union de Transporte y Ramas Anexas (UTRA) RESPECTFULLY PRAYS THAT THIS COURT ACCEPT THIS Motion of Dismissal.

Respectfully submitted, in San Juan, Puerto Rico, and this 17 Day of September, 2014.

It is hereby certified that the foregoing motion with clerk of court was send via Certified Mail to Plaintiff (RST) legal counsel; Casellas Alcover & Burgos, P.S.C., PO BOX 364924, San Juan, P.R. 00936-4924.

GERMAN VAZQUEZ COLON  
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